

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**
Richmond Division

IN RE:)	
)	
JOHN WILLIAM COPPEDGE)	Case No. 18-31387-KRH
JANICE SHANNON COPPEDGE)	Chapter 13
)	
Debtors)	

MOTION TO SELL REAL ESTATE

COME NOW, the Debtors, by counsel, and as and for Debtors' Motion to Sell Real Estate, state as follows:

1. The Debtors filed this case under Chapter 13 of the U.S. Bankruptcy Code on March 18, 2018.
2. Select Portfolio Servicing, Inc. is a secured creditor which holds a mortgage on the property known as 293 Cedar Fork Road, Henrico, VA 23223, more particularly known as:

ALL THAT CERTAIN OR PARCEL OF LAND WITH THE IMPROVEMENTS THEREON AND APPURTENANCES THERETO BELONGING, LYING, BEING AND SITUATE IN FAIRFIELD DISTRICT, HENRICO COUNTY, VIRGINIA, DESIGNATED AS LOT 5, BLOCK A, SECTION A, CEDAR FORKS ESTATES, AS MORE PARTICULARLY SHOWN ON PLAT OF SUBDIVISION ENTITLED "CEDAR FORKS ESTATES, SECTION A," MADE BY BODIE, TAYLOR, PURYEAR, INC., ENGINEERS AND SURVEYORS, DATED JANUARY 27, 1994, RECORDED JANUARY 31, 1994, IN THE CLERK'S OFFICE, CIRCUIT COURT, HENRICO COUNTY, VIRGINIA, IN PLAT BOOK 99, PAGE 10, REFERENCE TO WHICH IS HEREBY MADE FOR A MORE PARTICULAR DESCRIPTION OF SAID REAL ESTATE..

(the "Property").

James E. Kane (VSB #30081)
KANE & PAPA, P.C.
1313 East Cary Street
Richmond, VA 23219
(804) 225-9500 (phone)
(804) 225-9598 (fax)
Counsel for Debtors

3. The approximate payoff balance on the note secured by said mortgage is \$132,238.47. The tax assessed value of the Property is \$169,600.00.

4. Debtors entered into a contract ("Contract") for the sale of the Property for \$235,000.00, which, upon closing of the same, will result in Select Portfolio Servicing, Inc releasing its deed of trust against the Property. A copy of said contract is attached hereto collectively as Exhibit "A" and incorporated herein by this reference.

5. The amount of the proceeds to be applied to the Debtors' obligations under the confirmed plan in this case is \$27,120.00, which will result in full payment of the Chapter 13 Plan.

6. On December 30, 2020, or as soon thereafter as may be practicable, Debtors intend to sell their interest in the Property in accordance with the terms of the Contract.

WHEREFORE, the Debtors request that the Court enter an Order authorizing the sale of the Property in accordance with the terms of the Contract and for such other relief as the Court may deem appropriate

Dated: November 24, 2020

JOHN WILLIAM COPPEDGE
JANICE SHANNON COPPEDGE

By: /s/ James E. Kane
Counsel

James E. Kane (VSB #30081)
KANE & PAPA, P.C.
1313 East Cary Street
Richmond, VA 23219
(804) 225-9500 (phone)
(804) 225-9598 (fax)
Counsel for Debtors

CERTIFICATE OF SERVICE

I hereby certify that on November 24, 2020, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all parties registered to receive notice thereof, and I mailed a true and exact copy to the parties on the list attached hereto.

/s/ James E. Kane
Counsel for Debtors

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**
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IN RE:)	
)	
JOHN WILLIAM COPPEDGE)	Case No. 18-31387-KRH
JANICE SHANNON COPPEDGE)	Chapter 13
)	
Debtors)	

NOTICE OF MOTION AND HEARING

The above Debtors have filed a Motion to Sell Real Estate.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one).

The Debtors are requesting to their primary residence known as 293 Cedar Fork Road, Henrico, VA 23223 for \$235,000.00. The property is currently secured by a first deed of trust with an approximate balance of \$132,238.47 which balance is to be paid in full with the proceeds from the sale of the property. The amount of the proceeds to be applied to the Debtor's obligations under the confirmed plan in this case is \$27,120.00, which will result in full payment of the Chapter 13 Plan. The remaining amount of the proceeds from the sale are to be paid to the Debtors, approximately \$58,500.00 to be used for Debtor's moving and living expenses.

If you do not want the court to grant the relief sought in the motion, or if you want the court to consider your views on the motion, then you or your attorney must:

- File with the court, at the address shown below, a written request for a hearing [or written response pursuant to Local Bankruptcy Rule 9013-1(H)]. If you mail your request for a hearing (or response) to the court for filing, you must mail it early enough so the court will receive it on or before the date stated above, to:

Clerk of Court
United States Bankruptcy Court
701 East Broad Street
Richmond, VA 23219

You must also mail a copy to:

James E. Kane, Esquire
KANE & PAPA, P.C.
1313 East Cary Street
Richmond, Virginia 23219

- Attend a hearing scheduled for **December 16, 2020 at 12:00 p.m. at U.S. Bankruptcy Court, 701 East Broad Street, Room 5000, Richmond, VA 23219.** If no timely response has been filed opposing the relief requested, the court may grant the relief without holding a hearing.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.

Dated: November 24, 2020

JOHN WILLIAM COPPEDGE
JANICE SHANNON COPPEDGE

By: /s/ James E. Kane
Counsel

James E. Kane (VSB #30081)
KANE & PAPA, P.C.
1313 East Cary Street
Richmond, VA 23219
(804) 225-9500 (phone)
(804) 225-9598 (fax)
Counsel for Debtors

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/s/ James E. Kane
Counsel for Debtors

Label Matrix for local noticing

United States Bankruptcy Court
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Cavalry SPV I, LLC

0422-3

701 East Broad Street

500 Summit Lake Drive, Ste 400

Case 18-31387-KRH

Richmond, VA 23219-1888

Valhalla, NY 10595-2321

Eastern District of Virginia

Richmond

Mon Nov 23 15:35:13 EST 2020

Citibank / Sears

Citibank/The Home Depot

(p)GLASSER AND GLASSER P L C

Citicorp Credit Services/Attn: Centraliz

Citicorp Cr Srvs/Centralized Bankruptcy

P O BOX 3400

Po Box 790040

Po Box 790040

NORFOLK VA 23514-3400

Saint Louis, MO 63179-0040

St Louis, MO 63179-0040

Household Finance Corp II

Internal Revenue Service

Midland Funding

c/o Glasser & Glasser

P.O. Box 7346

Attn: Bankruptcy

580 East Main St. Ste 600

Philadelphia, PA 19101-7346

Po Box 939069

Norfolk, VA 23510-2322

San Diego, CA 92193-9069

Midland Funding LLC

(p)PORTFOLIO RECOVERY ASSOCIATES LLC

Quantum3 Group LLC as agent for

PO Box 2011

PO BOX 41067

MOMA Funding LLC

Warren, MI 48090-2011

NORFOLK VA 23541-1067

PO Box 788

Kirkland, WA 98083-0788

Select Portfolio Servicing, Inc

Synch/Ashley Homestore

Synchrony Bank/ JC Penneys

Po Box 65250

Attn: Bankruptcy

Attn: Bankruptcy

Salt Lake City, UT 84165-0250

Po Box 965060

Po Box 965060

Orlando, FL 32896-5060

Orlando, FL 32896-5060

Synchrony Bank/Care Credit

Synchrony Bank/Lowes

Town Bank

Attn: Bankruptcy

Attn: Bankruptcy

109 E. Main Street, Suite 100

Po Box 965060

Po Box 965060

Norfolk, VA 23510-1647

Orlando, FL 32896-5060

Orlando, FL 32896-5060

TowneBank

Verizon

Virginia Credit Union

J.Louis Roussos

by American InfoSource LP as agent

Po Box 90010

6001 Harbour View Blvd.

4515 N Santa Fe Ave

Richmond, VA 23225-9010

Suffolk, VA 23435-2767

Oklahoma City, OK 73118-7901

Virginia Department of Tax

James E. Kane

Janice Shannon Coppedge

P O Box 2156

Kane & Papa, PC

293 Cedar Fork Road

Richmond, VA 23218-2156

1313 East Cary Street

Henrico, VA 23223-2718

P.O. Box 508

Richmond, VA 23218-0508

John P. Fitzgerald, III

John William Coppedge III

Suzanne E. Wade

Office of the US Trustee - Region 4 -R

293 Cedar Fork Road

341 Dial 877-996-8484 Code 2385911

701 E. Broad Street, Ste. 4304

Henrico, VA 23223-2718

7202 Glen Forest Drive, Ste. 202

Richmond, VA 23219-1849

Richmond, VA 23226-3770

Glasser & Glasser

580 E. Main St.

Suite 600

Norfolk, VA 23510-0000

Portfolio Recovery Associates, LLC

POB 41067

Norfolk VA 23541

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The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)U.S. Bank National Association, as indentu

(d)Select Portfolio Servicing, Inc.

(d)Virginia Credit Union, Inc.

P.O. Box 65250

PO Box 90010

Salt Lake City, UT 84165-0250

Richmond, VA 23225-9010

(d)Virginia Credit Union, Inc.

PO Box 90010

Richmond, VA 23225-9010

End of Label Matrix

Mailable recipients 26

Bypassed recipients 4

Total 30